

CONDITIONALLY EXEMPT SMALL QUANTITY GENERATOR

What is a conditionally exempt small quantity generator?

The hazardous waste regulations identify three classifications of hazardous waste generators — conditionally exempt small quantity generator (CESQG), small quantity generator (SQG), and large quantity generator (LQG). The classification is based on how much hazardous waste is generated in a month and accumulated on-site.

- CESQGs generate less than 100 kilograms (220 pounds) of nonacute hazardous waste in a month AND never accumulate 1,000 kilograms (2,200 pounds) or more at a time. There is no time limit regarding how long the waste can be accumulated.
- SQGs generate 100 kilograms (220 pounds) to less than 1,000 kilograms (2,200 pounds) of nonacute hazardous waste in a month AND never accumulate 6,000 kilograms (13,200 pounds) or more at a time. Hazardous waste can be accumulated up to 180 days before shipping, or 270 days if shipping over 200 miles.
- LQGs generate 1,000 kilograms (2,200 pounds) or more of nonacute hazardous waste in a month. This classification also applies to facilities that generate or accumulate 2.2 pounds or more of an acutely hazardous or severely toxic waste. Acutely hazardous wastes are those on the “P” list and certain wastes on the “F” list; severely toxic wastes are those on the “S” list. Hazardous waste cannot be accumulated more than 90 days.

It is not necessary to count the following when determining your generator status:

- ✓ Waste being managed as universal waste;
- ✓ Reusable shop towels or other textiles that do not contain free liquids which are sent to a commercial cleaning service;
- ✓ Scrap metal being recycled;
- ✓ Some materials being recycled such as silver being reclaimed as precious metals, lead acid batteries, and used oil;
- ✓ The remaining residue in empty containers; or
- ✓ Additional exemptions too complex to summarize here. Review the regulations or discuss them with staff from the Waste Management Division district office.

How are CESQGs waste regulated?

Hazardous waste management is overseen by the Michigan Department of Environmental Quality (DEQ) Waste Management Division along with the US Environmental Protection Agency. Hazardous waste is regulated under Part 111 of Public Act 451 of 1994, as amended (Act 451), and Administrative Rules, along with the federal Resource Recovery and Conservation Act (RCRA) 40 CFR Parts 260-299. Rule 205 of the Michigan hazardous waste rules and 40 CFR Part 261.5 list the special requirements for CESQGs. In addition, liquid industrial waste that is not regulated as hazardous waste must be handled according to the management requirements of Part 121 of Act 451. Solid waste is regulated under Part 115 of Act 451. The US Department of Transportation oversees the regulations regarding hazardous waste containers and shipping requirements under 49 CFR Parts 100-I 99.

How are CESQGs waste managed?

1. Determine if the waste is a hazardous waste. This can be done by either knowledge of the hazardous characteristics of the waste or the process used to generate the waste or

by testing it by using the methods referenced in Rule 212. Keep records of this determination for at least 3 years.

2. Determine if any regulatory exclusions apply to the hazardous waste.
3. Accumulate the waste in an area where it is protected from weather, fire, physical damage, and vandals. Meet the fire marshal's isolation distances from property lines, etc., for flammable and combustible materials. The waste must also be accumulated in a manner that prohibits a release into the soil, surface water or groundwater, or into drains or sewers, and that does not release air emissions that violate air quality regulations. Secondary containment is recommended.
4. Label the container with the content name; e.g., "Used Oil" or "Spent Antifreeze."
5. Keep each storage container in good condition and replace any leaking ones. Keep the container closed except when adding or removing waste. Avoid overfilling the container. Use a container compatible with the type of waste placed in it.
6. Treat or dispose of the hazardous waste in an on-site facility or ensure delivery to a facility that will store, treat, or dispose of the waste.
 - On-site recycling or treatment units do not require a permit from the Waste Management Division if you recycle or treat your own waste. (Some units may require an Air Quality Division permit.)
 - Off-site facilities can be any one of the following that is in compliance with the applicable regulations which oversee their operation:
 - ✓ Licensed or interim status hazardous waste treatment, storage, or disposal facility
 - ✓ Licensed solid waste landfill (liquid waste cannot be sent to a landfill.)
 - ✓ Legitimate recycler or reclamation facility
 - ✓ Publicly owned wastewater treatment plant (It is necessary to obtain prior permission to discharge to a wastewater treatment plant. It is recommended you get written documentation. The plant may have requirements that you must meet.)
 - ✓ Permitted incinerator

- ✓ Universal waste handler or destination facility (See the DEQ "Universal Waste" publication for more information regarding universal waste.)
 - ✓ Other treatment facilities or out-of-state facilities approved to handle the waste
7. Obtain either a Michigan Identification Number (e.g., MIG) or an EPA Identification Number (e.g., MIO, MIR, or MID) for shipments of liquid waste off-site. Some transporters require their clients to have an EPA number. If you have an EPA number, you must use that number on the manifest.
 - ✓ Call 517-373-7314 to obtain a Michigan Identification Number.
 - ✓ Call 517-335-5139 to obtain form EQP5 50 to apply for an EPA Identification Number.
 8. Ship liquid waste with a manifest using a licensed transporter or by hauling your own waste. It is not necessary to ship solid waste with a manifest. Most transporters provide manifests, or blank ones may be ordered from the Waste Management Division for a fee. Call 517-373-1217 for the current price and ordering information.
 - ✓ Submit the DEQ copy to the following address within 10 days after the end of the month in which the waste was shipped:
DEQ WASTE MANAGEMENT DIVISION
MANIFEST UNIT
PO BOX 30038
LANSING MI 48909-7938
 - ✓ Obtain a signed copy from the treatment, storage, or disposal facility within 35 days of the shipment. Contact the transporter and/or treatment, storage, or disposal facility to determine what happened to your shipment if you have not received the copy. If you still have not received a copy within 45 days of shipment, send a copy of the manifest and a letter explaining what contacts you have had or any other information about the shipment to the above address.
 - ✓ Keep signed manifest copies for at least 3 years.
 9. If the amount of hazardous waste generated or accumulated exceeds the CESQG limits, then the waste must be managed according to the applicable SQG or LQG requirements.

Contact the DEQ Waste Management Division district office or call 800-662-9278 for more information.

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